

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

Division

FILED

OCT 20 2020 DB

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

03-20 0907

Alisa Steverson, William Steverson JR, Chrisdeana Steverson,
Eli Steverson

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Cumberland Heights

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE

(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Alisa Steverson, William Steverson, Chrisdeana Steverson, Eli Steverson
Street Address	p o box 152
City and County	pegram/cheatham
State and Zip Code	TN/37143
Telephone Number	615-739-8505
E-mail Address	

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Cumberland Heights
Job or Title <i>(if known)</i>	
Street Address	8283 River Rd Pike
City and County	Nashville/Davidson
State and Zip Code	TN/37209
Telephone Number	(615) 352-1757
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) Alisa Steverson, William Steverson, Chrisdeana E, is a citizen of the State of (name) TN.

2. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____, Or is a citizen of (foreign nation) _____.

2. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

2 million \$2,000,000

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) Oct 25-27, 2019, at (place) Cumberland Heights Facility,
the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)*

please see attached papers

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *(explain)*

please see attached papers

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

please see attached papers

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/16/2020

Signature of Plaintiff

Printed Name of Plaintiff Alisa Steverson, William Steverson, Chrisdeana Steverson, Eli Steverson

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

William Steverson IV
 Admission date: Sept 25, 2019
 to Cumberland Heights Rehab
 facility on River Rd Nashville Tn.
 William left Cumberland Heights
 Oct. 25 2019.

William Steverson IV A patient
 at Cumberland Heights went
 directly from Cumberland Heights
 to a sober living house called
 Keep it simple house, that is
 owned and operated by Cumberland
 Heights. When he arrived at
 the house Rodney Resha administered
 a drug test to William Steverson IV
 and Rodney said he failed the test.
 On Oct 26 Rodney administered
 another drug test to William, Rodney
 said he failed. On Oct 27th Rodney
 administered another drug test
 to William and Rodney told William
 he failed again, and was therefore
 ordered to leave the sober living
 house immediately. (Text messages
 are available at Sheriff's office)
 Cumberland Heights stated the
 drug test was positive.

Rodney Resha before administering
 the drug test stated to William
 Steverson IV that he did not like
 William or any other Steverson, then

administered the drug test to William, William Steverson IV left Cumberland Heights sober living house and Oct 27, 2019 went directly to Vanderbilt ER where William requested Vanderbilt to immediately perform another drug test on him. Vanderbilt ER agreed to administer a drug on William. The drug test from Vanderbilt ER came back Negative. The test was taken at approx. 7:00 pm at Cumberland Heights sober House where Cumberland Heights claimed that William Steverson failed the drug test. William Steverson was told to leave the facility. He then went straight to Vanderbilt ER where they administered a drug test to William Steverson and he passed the drug test. We have the drug test from Vanderbilt. Cumberland Heights refused to furnish the positive test that Cumberland Heights claimed that William Steverson IV failed! William Steverson had fully trusted, as so did Williams sister (Chrisdeana Steverson), Williams father (William Steverson Jr), his brother (Eli Steverson) and his mother (Alisa Steverson) are all Alumni of Cumberland Heights including his grandfather.

The entire family fully trusted Cumberland Heights with William Stevenson IV life. William Stevenson IV was devastated when Cumberland Heights ordered him to leave Cumberland Heights property knowing full well that William had not taken any drugs that were not prescribed and approved by Cumberland Heights. All William knew to do was go to Vanderbilt and get a blood test to confirm he was clean of all drugs. The blood test results came back at approx. 1:12 am Oct 27th, 2019 when William was ordered by Cumberland Heights facility to leave he was devastated! William Stevenson had faith in Cumberland Heights to help him live a sober life without drugs and alcohol, but instead of being able to finish the Program and get the help that he so desperately needed and wanted to save his life was instead kicked out before completion of the program that his life depended on. William did everything that he was asked to do. William and his counsers all knew that his life was in jeopardy.

William was willing to take any and all suggestions from the staff that he trusted with his life.

Within 24 hours of being kicked out of Cumberland Heights facility before he could complete the program and was not allowed to return and finish the program that he desperately needed, 24 hours later he relapsed. William went into a deep depression after he was humiliated by Cumberland Heights, he started drinking again. Brian Hicks and Rodney Resha are the ones that told William he had the leave the facility on Oct 27, 2019.

Brian Hicks and Rodney Resha stated that they did not like anyone with the last name Stevenson.

If not for the action of negligence of Rodney Resha, Brian Hicks and the staff of Cumberland Heights not allowing William Stevenson IV this wonderful caring, compassionate, God loving young man would still be alive. Because of Cumberland Heights

neglect, William Steverson IV
was taken from his mother,
father, brother, sister, grandmothers
and everyone that loved
him. William Steverson IV
touched so many lives and
is severely missed. Our lives
are changed forever.
I just want justice
for my family and my son.
All of the money in the world
can not bring my son
back to us.